

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
STATESVILLE DIVISION**

CROWN EQUIPMENT CORPORATION,

Plaintiff,

v.

DAVIS BRADY, ET AL.,

Defendants.

Case No. 5:23-CV-00059

**DEFENDANT PNEU-MECH SYSTEMS MANUFACTURING, INC.'S MOTION
FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S FIRST SET OF
INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS**

Now comes the Defendant, PNEU-MECH SYSTEMS MANUFACTURING, INC., by and through counsel, and moves the Court pursuant to Rule 6(b) and Rule 26 of the Federal Rules of Civil Procedure, and Local rule 7.1, for an extension of time to respond to Plaintiff's First Set of Interrogatories and Request for Production of Documents and respectfully shows unto the Court:

1. That the Defendant was allegedly served by mail with a copy of Plaintiff's First Set of Interrogatories and Request for Production of Documents on August 1, 2024.
2. The deadline to respond to the discovery is August 31, 2024, has not expired, and the undersigned counsel needs additional time to respond to each request.
3. The undersigned has consulted with counsel for Plaintiff with regards to the above referenced extension, and counsel for Plaintiff has consented to Defendant's extension request.

WHEREFORE, Defendant prays the Court that it grant an extension to respond to Plaintiff's Interrogatories and Request for Production of Documents, up to and including October 3, 2024.

This the 22nd day of August, 2024.

**HEDRICK GARDNER KINCHELOE &
GAROFALO LLP**

/s/Jarrold B. Summey

JARROD B. SUMMEY

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***Attorney for Defendant Pneu-Mech
Systems Manufacutring, Inc.***

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of August, 2024, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of filing to all counsel of record.

This the 22nd day of August, 2024.

**HEDRICK GARDNER KINCHELOE &
GAROFALO LLP**

/s/Jarrold B. Summey
JARROD B. SUMMEY
NC State Bar No. 49548
Attorney for Defendant Pneu-Mech
Systems Manufacutring, Inc.